

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE

In re:

CHAPTER 11

Beato Auto Sales, Inc.,

Case Number 23-10064-BAH

Debtor

**AFFIDAVIT IN SUPPORT OF DEBTOR'S *EX PARTE* MOTION
FOR INTERIM AUTHORITY TO USE CASH COLLATERAL**

I Carl Amaral of Accubooks, serving in my capacity as financial advisor and accountant for Beato Auto Sales, Inc. (the "Debtor"), being duly sworn do hereby depose and state under oath and penalties of perjury that:

1. I am over 18 years of age.
2. I am a principal of AccuBooks.
3. I am making this affidavit upon my own personal knowledge, except in those instances in which the matter set further herein is asserted upon information and belief.
4. Attached hereto is the cash collateral budget (the "Budget") that I personally prepared.
5. I am advised by Debtor's counsel that the names and addresses of all persons holding or claiming to hold a security interest in cash collateral of the Debtor as such term is defined in Section 363 of the Bankruptcy Code and their attorneys (to the extent known) are:

Automotive Finance Corporation
c/o Jacobson Hile Kight, LLC
Attn: Andrew T. Kight
108 E. 9th St.
Indianapolis, IN 46202

XL Funding
400 Charter Way
North Billerica MA 01862

Lendbuzz
9 Turnpike Road
Ipswich MA 01938

Shamrock Finance
9 Turnpike Road
Ipswich MA 01938

NextGear
11799 North College Avenue
Carmel IN 46032

Samson Funding
17 State St.
New York NY 10004

Newtek Small Business Finance Inc.
1981 Marcus Avenue Suite 130
Lake Success NY 11042

Small Business Administration
409 3rd St SW.
Washington DC 20416

6. A copy of the Motion has been emailed where possible, and where not, sent by regular mail to each of the Debtor's twenty (20) largest creditors

7. The use of cash collateral for the purposes shown in the Budget is necessary for the continuation of the Debtor's business. Without cash with which to pay payroll and essential goods and services, the Debtor likely would be required to terminate its operations and lay off employees. Allowing the Debtor to continue to operate in the ordinary course will preserve the value of the estate for the benefit of creditors.

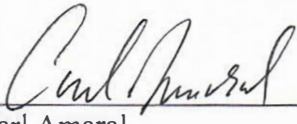
8. In accordance with the Budget, the sum of \$2,795,000 will be generated from service and the sale of used car inventory during the Use Period. Total expenses during the period will be \$2,788,817, leaving a positive cash flow of \$6,183 and an ending cash balance of \$56,183.

9. The Debtor believes that the following circumstances justify approval of the Motion on an interim basis pursuant to Local Rule of Bankruptcy Procedure 4001-2:

- A. The Debtor has an ongoing business that requires a certain cash flow to purchase services and supplies necessary to continue operations; and
- B. The Debtor's employees are important to the continued operation of the business and deserve to be paid.

10. I declare under the penalty of perjury that to the best of my knowledge and belief all of the foregoing is true and correct.

Executed this 15th day of February, 2023 under the pains and penalties of perjury.



Carl Amaral

STATE OF MASSACHUSETTS
COUNTY OF _____

On this 15th day of February, before me, the undersigned officer personally appeared Carl Amaral, known to me to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

Signature: _____

Printed Name: _____

Justice of the Peace/Notary Public
Commission Expires _____

